

**United States Bankruptcy Court  
Eastern District of Pennsylvania**

In re: Tri-State Paper, Inc., *Debtor*.

Case No. 23-13237-pmm  
Chapter 11

**Debtor's Objection to Claim No. 3 of Citizens Bank, N.A.**


Debtor Tri-State Paper, Inc., by and through its attorney, states as follows:

1. On November 2, 2023, Claimant Citizens Bank, N.A. filed Claim No. 3 alleging a wholly-secured mortgage debt in the amount of \$436,624.72. Exhibit A.
2. The supporting documentation attached to the claim alleges a principal balance in the amount of \$377,220.61.
3. The supporting documentation also alleges interest totaling \$24,435.35, late charges totaling \$21,457.52, and legal fees and costs totaling \$13,511.24, with no itemized statement explaining the nature of such interest, fees, and expenses.
4. Without an itemization, the Debtor cannot determine whether the alleged interest, fees, and expenses are appropriate and valid.
5. The Debtor objects to Claim No. 3 pursuant to 11 U.S.C. § 502, Fed. R. Bankr. P. 3007, and L.B.R. 3007-1.
6. Unless the Claimant amends the proof of claim to include appropriate supporting documentation, the Court must disallow the alleged interest, fees, and expenses.

For those reasons, the Debtor respectfully moves the Court to grant relief in the form of order attached and further in its favor, if necessary and proper under the law.

Dated: January 4, 2024

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